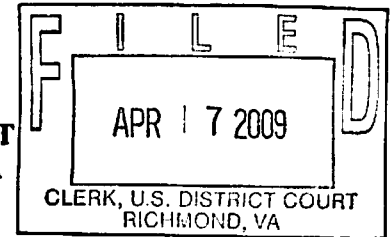


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**



**JEROME D. MOORE
REGINA L. MOORE**

Plaintiff(s)

Vs.

**CHEX SYSTEM INC.,
EXPERIAN INC.
FIRST DATA CORPORATION**

Defendant(s)

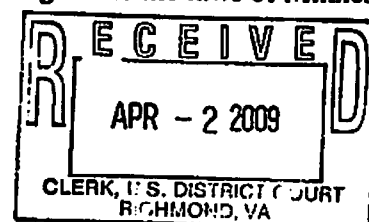
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COMPLAINT

Comes Now Plaintiff Jerome D. Moore and Regina L. Moore hereafter referred as "Plaintiff") complains of Chex System Inc, Experian Inc, and TeleCheck Inc referred hereafter as "Defendants"). This action is based upon Defendants willfully failure to set up or maintain reasonable procedures to assure the accuracy of information contained in credit reports in violation of the Fair Credit Reporting Act, 15 U.S.C." 1681 gt seq (referred hereafter as "FCRA"). In addition, the second cause of action is Defendants refusal to investigate information contained in Plaintiff's credit file or consumer file in violation of the Fair Credit Reporting Act, 15 U.S.C." 1681 gt seq.

PARTIES, JURRISDICTION, AND VENUE

1. The named Plaintiff's are citizens and residents of the State of Virginia and are consumers as defined by 1681a(c) of the FCRA.
2. Chex Systems Inc. is a corporation organized and existing under the laws of Minnesota



and doing business in the State of Virginia and throughout the United States. Defendant is severally liable for the allegations as stated within the Complaint.

3. Experian Inc. is a corporation organized and existing under the laws of Texas and doing business in the State of Virginia and throughout the United States. Defendant is severally liable for the allegations as stated within the Complaint.

4. First Data Corporation is a corporation organized and existing under the laws of Colorado and doing business in the State of Virginia and throughout the United States. Defendant is severally liable for the allegations as stated within the Complaint.

5. Defendants are "consumer reporting agencies" as defined by The Fair Credit Reporting Act (FCRA) 15 U.S.C. § 1681a (f) et seq. and are consumer reporting agencies that compiles and maintains files on consumers on a nationwide basis as defined by § 1681a (p) of the FCRA. Defendants, regularly engages in the business of assembling, evaluating and dispersing information concerning the credit history of consumers for the purpose of furnishing consumer reports as defined by § 1681a(d) of the FCRA .This Court has jurisdiction to hear this case pursuant to). Venue is proper within this district and division pursuant to 15 U.S.C. § 1681p and 28 U.S.C. § 1391(b).

ALLEGATIONS AS TO THE NAMED PLAINTIFFS

6. Within the previous three years of the filing of this Complaint, Defendant, prepared and distribute inaccurate and misleading information in Jerome D. Moore and Regina L. Moore consumer report. Upon learning of Defendants methods regarding several adverse accounts listed on their credit reports. Plaintiffs contacted Defendants and disputed said accounts as provided by the FCRA 15 U.S.C. § 1681i. However, Defendants refused to investigate these accounts. Defendants, blanket and vague assertions that the disputed accounts were

previously investigated falls short as a matter of law.

7. Within the previous three years of the filing of this Complaint, Defendants, refuse to block the information and accounts Plaintiffs reported to Defendants as a result of Identity Theft as provided by 15 U.S.C. §1681c(2).

8. Defendants violations of the FCRA have been willful, wantonness, and reckless, Defendants and its agents knew or reasonably should have known, they were failing to comply with the requirements of the FCRA.

10.15 U.S.C. §1681(n)(a) of the FCRA provides that a consumer reporting agency that willfully fails to comply with the FCRA with respect to any consumer is liable to that consumer for statutory and punitive damages including attorney fees and costs.

DAMAGES

Wherefore Plaintiffs respectfully request that judgment be had against Defendant as follows.

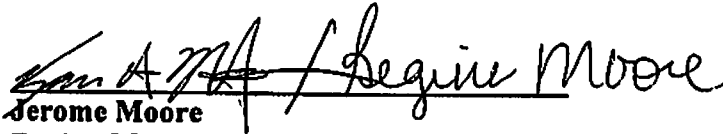
A. Statutory Damages for Plaintiffs are no less than \$100.00 and no more than \$1,000.00 for each violation.

B. Punitive Damages in the enlighten conscious of the jury;

C. Attorney's Fees, expenses, and costs

D. Such other relief as the Court deems, just and proper.

I hereby certify under the penalty of perjury that I have placed the forgoing in the United States Postage this the 30th day of March 2009.

A handwritten signature in cursive script, appearing to read "Regina Moore". The signature is written over a horizontal line.

**Jerome Moore
Regina Moore
PO Box 8144
Norfolk, VA 23503**